

**REMARKS**

The Examiner has rejected Claims 1-34 as being unpatentable over U.S. Patent No. 6,285,748 under 35 USC 103(a).

With regard to Claim 1, the Examiner asserts that Lewis teaches a method for managing telecommunications trunk groups. However, Lewis nowhere mentions trunk groups. The Examiner contends that lines 38-38 of Column 1 of Lewis disclose “receiving information regarding the configuration of telephony circuits comprising each trunk group to be managed” as recited by Claim 1. However, such reference instead discloses monitoring traffic communication information by traffic type and storing it in a database. Some reference has nothing to do with trunk groups, the configuration of telephony circuits, or the management of trunk groups. Nowhere does Lewis disclose, teach, or suggest such limitation.

The Examiner further contends that lines 39-52 of Column 1 disclose “receiving traffic information regarding the historical volume of traffic using the hardware associated with a trunk group.” Again, nowhere are trunk groups discussed within such reference, much less traffic volume using hardware associated with the trunk group. Instead, the references discusses comparing the volume of voice traffic to data traffic over different portions of a day and differentiating billing rates between the two kinds of traffic. Such discussion has nothing whatsoever to do with Claim 1. Nowhere does Lewis disclose, teach, or suggest such limitation.

The Examiner further contends that lines 11 through 18 of Column 3 of Lewis somehow anticipate hardware being associated into trunk groups. That is not the case, as the cited portion of Lewis instead merely states that all elements of a network can be adapted to monitor traffic types – again, a statement that is irrelevant to Claim 1.

The Examiner further contends that the mere fact that a “display” is well known somehow anticipates the last two entire elements of Claim 1, even when taken in combination with the remainder of Claim 1. Obviously, a *prima facie* case of obviousness has not been made, and the Lewis reference appears entirely unrelated to any of the limitations of Claim 1. Nowhere does Lewis disclose, teach, or suggest such limitations.

With regard to Claims 7, 13, 19, 29, and 34, the Examiner appears to be asserting that table 1 of Column 4 illustrates “determining the percentage utilization of each trunk group.” While table 1

does state percentages, that is as close as it comes to disclosing a percentage utilization of a trunk group. Instead, table 1 and the accompanying description describe an example of the use in which office phones and fax machines are utilized to communicate either data (via fax, for example) or voice. Office equipment devices are not trunk groups, and the percentage of use TYPE is not the same as the percentage of USE. Nowhere does Lewis disclose, teach, or suggest such a limitation.

Inexplicably, the Examiner groups all of the various limitations of Claims 2-4, 14-15, 20-23, and 30-31 and states that they are obvious in light of the previously discussed tortured read of Lewis on Claims 1, 13, 19, and 29. The only additional explanation is a misapplication of the teachings of *In re Venner*. Using the Examiner's logic, the first computer would not have been patentable because it merely "automated" the mathematical operations that were previously done by hand calculation. The Examiner ignores the remaining cited elements of Claims 2-4, 14-15, 20-23, and 30-31, some of which are extremely significant. For example, Claim 3 recites "calculating the number of trunks required for the selected trunk group to provide the set grade of service" and Claim 4 recites "determining the percent utilization of the selected trunk group that would result if the proposed configuration changes are made." Nowhere does Lewis disclose, teach, or suggest such limitations.

In discussing the valuable network planning capabilities recited by Claims 5-6, 16-18, and 32-33, the Examiner only states that the fact that trunks may be added to and removed from a network renders the limitations of such claims obvious. The Examiner is ignoring the recited limitations of those claims, particularly when taken together with the limitations of the claims such claims are dependent thereon. More specifically, the limitations allow the impact of trunk addition and removal on a network to be easily evaluated – something that may be critical to network planning and monitoring. Nowhere does Lewis disclose, teach, or suggest such limitations.

Regarding Claims 8-10, 24-26, 11, 27, 12, and 28, the Examiner cites seemingly irrelevant portions of Lewis without any explanation whatsoever. Nowhere does Lewis disclose, teach, or suggest such limitations. Clearly, a *prima facie* case of obviousness under 35 USC 103 has not been made.

For at least these reasons, Claims 1-34 are allowable over the cited references. Reconsideration is respectfully requested.

**CONCLUSION**

For the foregoing reasons, and for other apparent reasons, Applicants respectfully request reconsideration and favorable action. If the Examiner feels a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants believe no fee is due. However, if a fee is due, please charge our Deposit Account No. 19-3140, under Order No. 024777.0126PTUS from which the undersigned is authorized to draw.

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Respectfully submitted,

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